

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/25/2022

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
KATHLEEN E. CASSIDY
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
KAREN R. KING
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

bfischer@maglaw.com
(212) 880-9585

SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
ROBERT G. MORVILLO
1938 - 2011
MICHAEL C. SILBERBERG
1940 - 2002
JOHN J. TIGUE, JR.
1939 - 2009

*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

October 25, 2022

By ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Milton Palacio, Case No. 21-Cr.-00603 (VEC)

Dear Judge Caproni:

This firm represents Defendant Milton Palacio in the above-captioned matter. I write to respectfully request a temporary modification of Mr. Palacio's bail conditions to allow him to travel to the Western and Eastern Districts of Pennsylvania (Pittsburgh and Philadelphia, and points in between) from October 28, 2022 through October 31, 2022 to see a family member. We also would request that Mr. Palacio be permitted to travel to the District of Massachusetts as one of his flights connects through Boston. His bail conditions currently restrict his travel to the Southern and Eastern Districts of New York, the District of Oregon, the District of Colorado, and the Southern, Northern, and Eastern Districts of California.

Both the government and pretrial services are aware of this request and do not object. Mr. Palacio will provide his travel itinerary to his pretrial officer in advance of travel.

We appreciate the Court's consideration of this request.

Application GRANTED. Mr. Palacio must provide pretrial services the addresses where he will be staying in Pittsburgh and Philadelphia.

SO ORDERED.

10/25/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

/s/ Benjamin S. Fischer

Benjamin S. Fischer